

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**U.S. SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**VLADISLAV KLIUSHIN, *et al.*,**

**Defendants.**

**Case No. 1:21-cv-12088-DLC**

**DECLARATION OF JAMES P. CONNOR IN SUPPORT OF PLAINTIFF'S  
SUPPLEMENTAL MOTION FOR ALTERNATIVE SERVICE**

I, James P. Connor, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am employed as a trial attorney by the United States Securities and Exchange Commission ("SEC") in the Division of Enforcement, at the SEC's headquarters office in Washington, D.C. Along with my co-counsel, I represent the SEC in the above-captioned matter.

2. On February 11, 2022, the SEC filed a motion for alternative service seeking an order authorizing the SEC to serve the Complaint and Summons (ECF Nos. 1 and 2) by alternative means upon Defendants Nikolai Rumiantcev, a/k/a Nikolay Rummyantcev ("Rumiantcev"), Mikhail Irzak ("Irzak"), Igor Sladkov ("Sladkov"), and Ivan Yermakov, a/k/a Ivan Ermakov ("Yermakov") (collectively, the "Service Defendants"), by (a) email to addresses that these Defendants have used; and (b) publication in *The New York Times International Edition* for distribution in Russia, where the Service Defendants reside.

3. On February 2, 2022, before the SEC filed the motion, I contacted a representative of the *The New York Times* and obtained pricing from that representative for

placement of a notice in *The New York Times International Edition* in order to serve the Service Defendants in Russia by publication, if authorized by the Court.

4. On February 24, 2022, news reports indicated that Russia had invaded Ukraine.

5. As of the date of this declaration, news reports indicate that the war in Ukraine is ongoing.

6. On April 12, 2022, the Court granted the SEC's motion to serve the Complaint and Summons by alternative means, including by publication and email, upon the Service Defendants. *See* ECF No. 13 (Electronic Order).

7. On that same day, I again contacted a representative of *The New York Times* to arrange for placement of the notice set forth in the SEC's Memorandum in Support of our Motion for Alternative Service, in order to serve the Service Defendants by publication. *See* ECF No. 8 at 14-15.

8. The following day, on April 13, 2021, the representative from the *The New York Times* informed me that *The New York Times International Edition* was no longer distributed in Russia.

9. Following that discussion, I attempted to find an alternative newspaper to publish the notice. My efforts included researching other international newspapers and conferring internally with SEC colleagues, including in our Office of International Affairs, who are knowledgeable about serving by publication abroad and about circumstances in Russia. Despite these efforts, I was unable to identify an international newspaper that is currently distributed in Russia in which the SEC could publish the notice.

10. On April 21, 2021, I emailed a copy of the Complaint (ECF No. 1), Summons, and Electronic Order granting the SEC's Motion for Alternative Service (ECF No. 13) to the Service Defendants at the following email addresses:

<b>Defendant</b>	<b>Email Address</b>
Nikolai Rumiantcev	<a href="mailto:nr@m13.su">nr@m13.su</a>
Mikhail Irzak	<a href="mailto:mikka777@yahoo.com">mikka777@yahoo.com</a>
Igor Sladkov	<a href="mailto:isladkov@mail.ru">isladkov@mail.ru</a>
Ivan Yermakov	<a href="mailto:i.s.ermakow@yandex.ru">i.s.ermakow@yandex.ru</a>

11. I did not receive any bounce-back notifications indicating that my emails were not delivered to the email addresses identified in paragraph 10 of this Declaration.

12. As of the date of this declaration, I continue to be unable to identify an international newspaper that is currently distributed in Russia, in which the SEC could publish the notice of this lawsuit.

I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: May 27, 2022

/s/ James P. Connor  
James P. Connor